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U.S. v. AVX
Litigation Department

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October 11, 1984

Charles C. Bering, Esq.
United States Environmental
Protection Agency
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RECEIVED

15 OCT 1984

**REGION I
OFFICE OF REGIONAL COUNSEL**

Dear Mr. Bering:

This supplements my letter to you of October 10 in which I requested documents in connection with the preparation of responses to the RI/FS. I want to make it clear that I my request includes Interim Report No. 1, dated December 22, 1982 which is referred to on page 1 of the Tidal Cycle and PCB Mass Transport Study dated March 4, 1983 and prepared by the Environmental Response Team and the Technical Assistance Team of the EPA and the U.S. Coast Guard. I also want any further interim studies or drafts that led to the final report itself.

I also request copies of all drafts of the RI/FS of August, 1984, as well as all correspondence and memoranda referring to it, that are in the possession, custody or control of the United States Government, including all such documents in the files of NUS. Finally, I want all documents submitted to EPA, including the scope of work, with respect to the Sediment Transport Study being performed by Battelle under subcontract to NUS. I also want all proposals submitted to the EPA to perform the RAMP Project 007 Transport/Pathways Study.

ROPES & GRAY

Please submit the foregoing data to me as soon as possible. Again, this request for documents is made without waiver of any previously stated position with respect to entitlement to discovery in the litigation.

Very truly yours,

Paul B. Galvani

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PBG/jmm

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